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May 31, 2024

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: United States v. Roni Cohen-Pavon, 1:23-cr-00347-JGK

Dear Judge Koeltl:

We represent defendant Roni Cohen-Pavon (“Mr. Cohen-Pavon”) in the above-captioned action. On September 5, 2023, a personal recognizance bond was entered as to Mr. Cohen-Pavon following his appearance before Magistrate Judge Valerie Figueredo that same day (the “Bond”). Pursuant to the terms of the Bond, Mr. Cohen-Pavon is restricted to travel within Israel, the Southern District of New York, the Eastern District of New York, and points in between for travel to the Southern District of New York.

We write on Mr. Cohen-Pavon’s behalf to permit him to travel from Israel to Tokyo, Japan on June 4, 2024 through June 10, 2024 for business purposes.¹

Pretrial Services Officer Assistant Taelor Nisbeth was contacted regarding the travel request and took no position on the request, deferring to the Government’s position. Undersigned counsel contacted AUSAs Adam Hobson and Peter Davis and has been informed that the Government does not object to Mr. Cohen-Pavon’s travel request.

¹ These dates reflect the time of Mr. Cohen-Pavon’s proposed travel in the Israeli time zone.



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We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Jeffrey A. Brown

Jeffrey A. Brown

cc: All counsel of record (*via ECF*)
Pretrial Services Officer Assistant Taelor Nisbeth (*via email*)